

Fill in this information to identify the case:

Debtor 1 Marcelles Rudolph Toussaint

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 18-03915 MJC**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information**Name of Creditor:** US Bank Trust National Association, Not In Its
Individual Capacity But Solely As Owner Trustee For
VRMTG Asset Trust**Court claim no. (if known):** 6-1**Last 4 digits** of any number you use to identify the debtor's account: 0620**Property address:**
151 Pinewood Dr N
E Stroudsburg, PA 18301**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ 1,900.21b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ 0.00c. **Total.** Add lines a and b. (c) \$ 1,900.21Creditor asserts that the debtor(s) are contractually obligated for 04 / 01 / 2023
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

***s/Brian C. Nicholas (Atty ID: 317240)**

Date 05/11/2023

Brian Nicholas
11 May 2023, 16:08:55, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

Pmt Due/Comments	Amt Due	Date Received	Amt Rec'd	Pmt Satisfied	To/From Suspense	Suspense Balance
Begin Suspense					\$ -	\$ -
	\$1,559.60	10/22/2018	\$1,639.77	10/1/2018	\$ 80.17	\$ 80.17
	\$1,559.60	11/14/2018	\$1,639.77	11/1/2018	\$ 80.17	\$ 160.34
	\$1,559.60	12/17/2018	\$1,639.77	12/1/2018	\$ 80.17	\$ 240.51
	\$1,559.60	1/17/2019	\$1,499.78	1/1/2019	\$ (59.82)	\$ 180.69
	\$1,559.60	2/14/2019	\$1,559.60	2/1/2019	\$ -	\$ 180.69
	\$1,559.60	3/15/2019	\$1,559.60	3/1/2019	\$ -	\$ 180.69
	\$1,559.60	4/9/2019	\$1,619.83	4/1/2019	\$ 60.23	\$ 240.92
	\$1,559.60	5/20/2019	\$1,619.83	5/1/2019	\$ 60.23	\$ 301.15
	\$1,559.60	7/16/2019	\$1,499.37	6/1/2019	\$ (60.23)	\$ 240.92
	\$1,559.60	8/12/2019	\$1,525.05	7/1/2019	\$ (34.55)	\$ 206.37
		8/20/2019	\$1.23		\$ 1.23	\$ 207.60
		8/26/2019	(\$1.23)		\$ (1.23)	\$ 206.37
	\$1,525.05	9/17/2019	\$1,525.05	8/1/2019	\$ -	\$ 206.37
	\$1,525.05	10/15/2019	\$1,525.05	9/1/2019	\$ -	\$ 206.37
	\$1,525.05	11/14/2019	\$1,525.05	10/1/2019	\$ -	\$ 206.37
	\$1,525.05	12/17/2019	\$1,525.05	11/1/2019	\$ -	\$ 206.37
	\$1,525.05	1/7/2020	\$1,525.05	12/1/2019	\$ -	\$ 206.37
	\$1,525.05	2/14/2020	\$1,525.05	1/1/2020	\$ -	\$ 206.37
	\$1,525.05	3/11/2020	\$1,525.05	2/1/2020	\$ -	\$ 206.37
	\$1,525.05	4/16/2020	\$1,525.05	3/1/2020	\$ -	\$ 206.37
	\$1,525.05	5/15/2020	\$1,525.05	4/1/2020	\$ -	\$ 206.37
	\$1,525.05	6/16/2020	\$1,519.94	5/1/2020	\$ (5.11)	\$ 201.26
	\$1,519.94	7/16/2020	\$1,519.94	6/1/2020	\$ -	\$ 201.26
	\$1,519.94	9/16/2020	\$1,519.94	7/1/2020	\$ -	\$ 201.26
	\$1,519.94	10/13/2020	\$1,519.94	8/1/2020	\$ -	\$ 201.26
	\$1,519.94	11/13/2020	\$1,519.94	9/1/2020	\$ -	\$ 201.26
	\$1,519.94	12/15/2020	\$1,519.94	10/1/2020	\$ -	\$ 201.26
	\$1,519.94	1/13/2021	\$1,519.94	11/1/2020	\$ -	\$ 201.26
	\$1,519.94	2/12/2021	\$1,519.94	12/1/2020	\$ -	\$ 201.26
	\$1,519.94	3/1/2021	\$3,039.88	1/1/2021	\$ 1,519.94	\$ 1,721.20
	\$1,519.94			2/1/2021	\$ (1,519.94)	\$ 201.26
	\$1,519.94	3/16/2021	\$1,519.94	3/1/2021	\$ -	\$ 201.26
		4/20/2021	\$947.05		\$ 947.05	\$ 1,148.31
	\$1,519.94	5/17/2021	\$1,519.94	4/1/2021	\$ -	\$ 1,148.31
	\$1,519.89	6/29/2021	\$1,519.89	5/1/2021	\$ -	\$ 1,148.31
	\$1,519.89	7/14/2021	\$1,519.89	6/1/2021	\$ -	\$ 1,148.31
	\$1,519.89	8/11/2021	\$1,519.89	7/1/2021	\$ -	\$ 1,148.31
	\$1,519.89	9/13/2021	\$1,519.89	8/1/2021	\$ -	\$ 1,148.31
	\$1,519.89	10/21/2021	\$1,519.89	9/1/2021	\$ -	\$ 1,148.31
	\$1,519.89	11/20/2021	\$1,519.99	10/1/2021	\$ 0.10	\$ 1,148.41
	\$1,519.89	12/15/2021	\$1,519.89	11/1/2021	\$ -	\$ 1,148.41
	\$1,519.89	1/11/2022	\$1,519.89	12/1/2021	\$ -	\$ 1,148.41
	\$1,519.89	2/12/2022	\$1,519.89	1/1/2022	\$ -	\$ 1,148.41
	\$1,519.89	3/17/2022	\$1,528.73	2/1/2022	\$ 8.84	\$ 1,157.25

Post Petition Payment Ledger

[illegible]

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Marcelles Rudolph Toussaint aka
Rudolph M. Toussaint aka Rudolph
Toussaint aka M. Rudolph Toussaint aka
Rudolph Marcelles Toussaint**

Debtor(s)

**US Bank Trust National Association, Not
In Its Individual Capacity But Solely As
Owner Trustee For VRMTG Asset Trust**
Movant

vs.

**Marcelles Rudolph Toussaint aka
Rudolph M. Toussaint aka Rudolph
Toussaint aka M. Rudolph Toussaint aka
Rudolph Marcelles Toussaint**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 18-03915 MJC

Chapter 13

Related to Claim No. 6-1

**CERTIFICATE OF SERVICE
RESPOSNE TO NOTICE OF FINAL CURE**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May XX, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Marcelles Rudolph Toussaint aka Rudolph M.
Toussaint aka Rudolph Toussaint aka M. Rudolph
Toussaint aka Rudolph Marcelles Toussaint
151 Pinewood Drive N
East Stroudsburg, PA 18302

Attorney for Debtor(s) (via ECF)

Tullio DeLuca, Esq.
381 N. 9th Street
Scranton, PA 18504

Trustee (via ECF)

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: May XX, 2023

/s/ Brian C. Nicholas

Brian C. Nicholas Esquire
Attorney I.D. 317240
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-5366
bnicholas@kmlawgroup.com